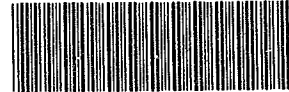


741-0794-000948

ETHYL CORPORATION
Health and Environment Department
ETHYL TOWER, 451 FLORIDA
BATON ROUGE, LOUISIANA 70801



INIT 07/26/94

June 6, 1988

Ms. Rebecca Wedge
Senior Scientist
Dynamac Corporation
The Dynamac Building
11140 Rockville Pike
Rockville, MD 20852

Dear Ms. Wedge:

As per your request, enclosed is the cover letter of Ethyl's non-confidential submission to ITC. Data on the following chemicals were included in the submission:

Decabromodiphenyl oxide
Octabromodiphenyl oxide
Pentabromodiphenyl oxide
Hexabromocyclododecane
N,N-dimethyl-1-dodecanamine
N,N-dimethyl-1-tetradecanamine
N,N-dimethyl-1-hexadecanamine
N,N-dimethyl-1-octadecanamine

Please contact Robert Brink, EPA, for the data submitted.

Sincerely,

A.M. Pettigrew
A. M. Pettigrew

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2651r
Enclosures

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ETHYL CORPORATION
Health and Environment Department
ETHYL TOWER, 451 FLORIDA
BATON ROUGE, LOUISIANA 70801

May 23, 1988

Mr. Robert Brink
Executive Secretary
TSCA Interagency Testing
Committee (TS-792)
U. S. Environmental Protection Agency
401 M Street, S.W.
Washington, DC 20460

Dear Mr. Brink:

RE: Decabromodiphenyl oxide, Octabromodiphenyl oxide,
Hexabromocyclododecane, Pentabromodiphenyl oxide

Ethyl Corporation is submitting the enclosed information in response to ITC's request for comments and data on brominated flame retardants.

Ethyl is a manufacturer of decabromodiphenyl oxide (1163-19-5), octabromodiphenyl oxide (32536-52-0), pentabromodiphenyl oxide (32534-81-9), and hexabromocyclododecane (3194-55-6). For your information, we have enclosed the following technical and toxicity data:

1. Saytex® Flame Retardants Product List (Ethyl Chemicals Group).
2. Technical Bulletins for decabromodiphenyl oxide, octabromodiphenyl oxide, and hexabromocyclododecane.
3. Material Safety Data Sheets for decabromodiphenyl oxide, octabromodiphenyl oxide, pentabromodiphenyl oxide, and hexabromocyclododecane.
4. Toxicology tests on:

Decabromodiphenyl oxide:

- Determination of DBDPO in rat livers (5/2/80)
- 90-day subchronic study in rats [Tracor-Jetco]
- Comedogenicity (9/21/81)
- Eye irritation (3/24/86)
- Human repeat insult patch test (6/4/75)
- 13-week feeding study in mice (7/27/79) [Tracor-Jetco]

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Mr. Robert Brink
May 23, 1988
Page 2

Octabromodiphenyl oxide:

- 1-hour dust inhalation (1/31/84)
- Two year dietary study in rates (?) paper/Dow
- Acute oral toxicity (12/5/83)
- Dermal irritation (11/29/83)
- Eye irritation (12/5/83)
- Ames test (7/1/85)
- Dose Range Finding Study (12/7/84)
- Embryo/fetal toxicity (4/15/85) & Review

Hexabromocyclododecane:

- Ames test (11/17/78)
- Inhalation LC₅₀/Dermal LC₅₀ (11/7/78)
- Primary dermal irritation/dermal corrosion/ocular irritation/oral LD₅₀ (10/17/78)

Pentabromodiphenyl oxide:

- Acute inhalation in rates (11/77)
- Acute oral toxicity in rates (11/84)
- Ames test (12/85)
- Bromacnegenic (9/77)
- Acute toxicity (9/77)
- Acute oral and percutaneous toxicity (9/77)
- Delayed hypersensitivity (10/77)
- Embryo/fetal toxicity (4/15/85)

In addition, under separate cover as attachment, Ethyl is submitting proprietary information which we are requesting the ITC to hold as "TSCA Confidential Business Information".

If you have any questions, please call me at (504) 388-7650.

Sincerely,



Louise L. Wen
Regulatory Affairs Associate

LLW/ccj
2600r

ETHYL CORPORATION
Health and Environment Department
ETHYL TOWER, 451 FLORIDA
BATON ROUGE, LOUISIANA 70801

May 23, 1988

Mr. Robert Brink
Executive Secretary
TSCA Interagency Testing
Committee (TS-792)
U.S. Environmental Protection Agency
401 M Street, S.W.
Washington, DC 20460

Dear Mr. Brink:

Ethyl Corporation is submitting the enclosed information in response to ITC's request for comments and data on tertiary amines.

Ethyl is a manufacturer of 1-dodecanamine, N,N-dimethyl (112-18-5), 1-hexadecanamine, N,N-dimethyl (112-69-6), 1-tetradecanamine, N,N-dimethyl (112-75-4) and 1-octadecanamine, N,N-dimethyl (124-28-7). For your information we have enclosed the following technical and acute toxicity data:

1. Product literature entitled "Fatty Tertiary Amines" (Ethyl Corporation Chemicals Group).
2. Material Safety Data Sheets for each of the above chemicals.
3. Toxicity Data on:

N,N-dimethyl-1-dodecanamine: Rabbit dermal LD₅₀ (6/7/79)
Rat oral toxicity (5/3/79)
DOT skin corrosivity (4/13/79)
Eye irritation (3/30/79)

N,N-dimethyl-1-tetradecanamine:
Rabbit dermal LD₅₀ (6/13/79)
Rat oral toxicity (5/3/79)
DOT skin corrosivity (4/13/79)
Eye irritation (3/30/79)

N,N-dimethyl-1-hexadecanamine:
Rabbit dermal toxicity (4/23/81)
Rat oral toxicity (5/30/79)
DOT skin corrosivity (2/8/80)
Eye irritation (3/30/79)

Mr. Robert Brink
Page 2
May 23, 1988

N,N-dimethyl-1-octadecanamine:

Rabbit dermal LD50 (2/13/80)
Rat oral toxicity (4/14/80)
DOT skin corrosivity (1/30/80)
Eye irritation (2/8/80)

In addition, under separate cover as attachment, Ethyl is submitting proprietary information which we are requesting the ITC to hold as "TSCA Confidential Business Information".

If you have any questions, please call me at (504) 388-7650.

Sincerely,



Louise L. Wen
Regulatory Affairs Associate

LLW:imc:ab
2555r